

Partially Opposed

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2. During its investigation into this action, NMAC discovered that Plaintiffs claim title through what appears to be a forged title. Because all of the witnesses necessary to establish the right to possess the Nissan Maxima are located outside of this Court's subpoena power, NMAC has moved to transfer venue.

3. Pursuing and enforcing subpoenas against persons and entities who are outside of the 100 mile radius is time consuming and expensive. Conducting this discovery from a Court with subpoena power over the relevant non-parties would significantly reduce time and expense.

4. If this Court does not grant the transfer, NMAC anticipates that it will need to extend the deadlines in the scheduling order to allow it to conduct discovery pertaining to, but not limited to, the following witnesses:

- Triangle Motors in Silsbee, TX;
- Fred Haas Nissan, L.P. in Tomball, TX;
- The Texas Department of Motor Vehicles;
- Melissa Ard of Silsbee, TX; and
- Tashia Marie Hubbard of Lake Charles, LA

5. Because Plaintiffs have retained possession of the Nissan Maxima, no party will be prejudiced by staying the discovery deadlines.

WHEREFORE, NMAC moves this Court to enter an order staying the discovery deadlines in its scheduling order pending resolution of its Motion to Transfer Venue.

/s/ T. Dylan Reeves

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CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ ECF system, which will send notification of such filing to all counsel of record.

/s/T. Dylan Reeves
OF COUNSEL